

Application No. 10/796,617  
Amendment Dated April 3, 2006  
Reply to Office Action Dated November 1, 2005

## **REMARKS**

### **1. Specification Amendments.**

Applicant has amended the abstract to conform with USPTO practices. No new matter has been added by this amendment.

### **2. Claim Amendments.**

The Claims have been reviewed and amended to correct the informalities and dependencies. Further, Claims 1, 3, 11, 20 and 25 have been amended overcome the examiner's 35 USC 102 objections. No new matter has been added any of these amendments.

### **3. 35 USC 102 Rejection.**

The Examiner has rejected claims 1 to 7 and 25 as being anticipated by U.S. Patent 6,318,459 to Wright or U.S. Patent 6,062,309 to Gosse.

The Examiner argues that both of these references disclose an anchor including a biasing means that engages and then moves respective ones of the anchoring slips radially towards and then into temporarily anchoring contact with the casing to prevent further rotation of the device connected to the anchor in either of the clockwise or counterclockwise directions. Applicant respectfully traverses the rejection. In particular, Wright discloses an anchor that is clearly intended and designed to prevent the anchor from rotating only when torque is applied in the clockwise direction. As will be evident from Figures 6 and 7 of Wright, slips 12 are clearly designed to retract when torque is applied in the counterclockwise direction, and to extend into casing gripping contact only when the anchor is rotated in the clockwise direction. Even the teeth 15 on the anchor slips are cut for gripping engagement in one direction only. Reference is made to Wright's teachings commencing at column 3, line 58 and particularly at the top of column 4, commencing at line 6 where Wright teaches that:

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"Similarly, rotation of anchor mantle 4 in a counterclockwise direction results in a retraction of the slips until they are disengaged from the interior surface of the well casing and received more closely against the exterior of anchoring device 1."

Wright continues in column 4, commencing at line 19 where he teaches that:

"Removal of the anchoring device merely requires rotation of anchor mandrel 4 in a counterclockwise direction so as to disengage slips 12 from the casing and once again allow rotational and/or vertical movement of the tool and the tubing string."

In complete contrast, the present invention is intended to stop rotation of the anchor in both the clockwise and counterclockwise directions. Independent claim 1 has been amended to more clearly require that the biasing means on the mandrel rotate "in the clockwise and counterclockwise directions to engage and then move respective ones of said anchoring slips radially towards and then into temporarily anchoring contact with the casing to prevent rotation of said mandrel and the device connected thereto in each of the clockwise and counterclockwise directions".

Clearly, Wright does not address himself to an anchor that has anchor slips which engage the well casing to prevent rotation of the anchor in both the clockwise or counterclockwise directions. Wright teaches movement of the anchoring slips into temporarily anchoring contact with the well casing only upon rotation of the mandrel in one direction, which is consistent with the object of all prior tubing anchors which are designed to release once the downhole pump is deactivated. However, because Wright's anchor will not reset the slip members when the anchor rotates in the counterclockwise direction, it will violently spin due to accumulated twist in the tubing string as is described in the present specification.

Independent claim 11 has been similarly amended to more clearly distinguishes over Wright in requiring that the cam means on the mandrel set the slips into gripping contact with the

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casing in both clockwise and counterclockwise directions. More specifically claim 11 now requires that there be:

“cam means on said mandrel for operatively engaging respective ones of said anchor members to bias them towards and into gripping contact with said casing upon rotation of said mandrel in one direction, and to operatively engage another of said anchor members upon rotation of said mandrel in the opposition direction, whereby gripping of the casing by said anchor members effectively stops the rotation of said mandrel relative to the casing in the clockwise and counterclockwise directions”

The requirement of claim 11 that there be gripping of the casing by the casing gripping anchor members upon rotation of the mandrel in both directions is completely unlike Wright who actually teaches in the opposite direction and requires that there be gripping only when the tool is rotated in the clockwise direction.

To better distinguish independent method claim 25 over Wright, this claim has been amended to require that the anchor members are actuatable in response to rotation of the mandrel “in each of the clockwise and counterclockwise directions” for movement between a first retracted position and a second well gripping position, wherein gripping of the well by said second set of anchor members prevents further rotation of said mandrel “and said device connected thereto in each of the clockwise and counterclockwise directions”.

As thus amended, it is believed that claim 25 clearly and patentably distinguishes over Wright.

It is submitted that each of independent claims 1, 11 and 25 further distinguishes over Gosse for the same reasons described above concerning Wright. Gosse is also a unidirectional

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anchor and reference is made in this regard to column 4, commencing at line 41 where Gosse teaches that:

“With a right-hand rotation of about 45 degrees or less, of mandrel 4 with respect to slip cage 16, rollers 14 move over to and bear against the accepting sections 48 of their adjacent slips 20, causing those slips to pivot or rock with respect to fulcrum 46 so that wicker sections 36 move outwardly to engage with the inner wall of casing 38, thereby immobilizing and setting anchor 2 in position. When in this set position, these springs 52 remain in a loaded state, but there is no longer any contact at surface 54 between the fluid by-pass grooves 40. The contact points are now the edges of the wickers.

By rotating the mandrel to the left, the slips 20 pivot in the other direction, about fulcrum 46, so that drag sections 34 instead of wicker sections 36 engage the casing wall, enabling anchor 2 to be directly pulled out of casing 38 or pushed through.”

These teachings, when read particularly in combination with Figures 10 and 11, clearly indicate that Gosse's anchor can only be set in one direction. Rollers 14 engage cam surfaces 48 to push the toothed portion of slips 20 into contact with casing 38 when the mandrel is rotated to the right or clockwise as seen in the drawings, and when the rollers are moved in the opposite direction there is no corresponding cam surface on the next adjacent slip 20 that the rollers can push against to move the teeth on the slip members into gripping contact. Clearly and obviously therefore Gosse's tool is provides unidirectional anchoring only.

The Examiner has rejected claims 1 to 3, 11, 12, 20, 25 and 26 as being anticipated by Aldridge. However, once again, Aldridge's tool is unidirectional only, and is not intended to

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drive the anchoring slips into gripping contact with the well casing upon rotation of the mandrel in each of the clockwise and counterclockwise directions.

Reference is made to Aldridge's teachings particularly at column 3, between lines 46 and 64, column 5, between lines 52 and 59, column 7, between lines 8 and 14 and lines 29 to 34, and also column 7, commencing at line 63 and continuing into column 8 all the way down to line 29. All of these passages are consistent with an anchor that is set only upon right hand or clockwise rotation of the mandrel, and reference is particularly made in this regard to Figure 3 which shows ratchet like cams which obviously can operate to apply gripping force in one direction only.

The requirements of amended claims 1, 11 and 25 that the cams push the slips into anchoring contact with the well casing in response to both clockwise and counterclockwise rotation of the mandrel are submitted to clearly and patentably distinguish these claims over Aldridge.

As the other claims objected to by the Examiner are all dependent upon independent claims which are believed to patentably distinguish over the cited references, the dependent claims are similarly believed to be allowable over the art.

In view of the foregoing, early and favourable reconsideration leading to allowance is respectfully urged.

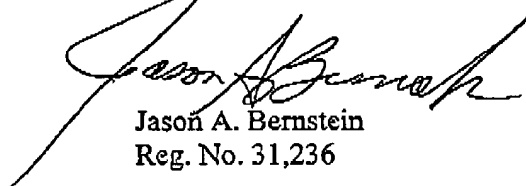
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**REMARKS**

Applicant submits that the patent application is in proper condition for allowance, and respectfully requests such action.

If the Examiner has any questions that can be resolved over the telephone, please contact the below signed patent attorney of record.

Respectfully submitted,  
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